

EXHIBIT 123

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

DECLARATION OF JUDY MOHR PETERSON, PhD

I, JUDY MOHR PETERSON, do declare and would competently testify as follows:

1. I am the Administrator of the Med-QUEST Division, Department of Human Services, State of Hawaii. I have held the position since July 1 2015.

2. I have personal knowledge of the matters set forth herein, or for those matters for which I do not have personal knowledge, I have reviewed information gathered from Med-QUEST records or by Med-QUEST employees.

3. The Med-QUEST Division provides eligible low-income adults and children access to health and medical coverage through managed care plans. Med-QUEST administers Hawaii's Medicaid program, QUEST Integration.

4. I am aware of DACA, and the recent announcement that the DACA program is being terminated.

5. The termination of DACA will likely cause more people to rely on state-funded and/or state administered public health care and other benefits, and thus impose additional costs on Hawaii.

6. Through Hawaii's state-administered Medicaid One-Time Emergency services, Med-QUEST reimburses hospitals for emergency and urgent services provided to qualifying uninsured Hawaii patients. This would include DACA grantees, who may be eligible for the Medicaid One-Time Emergency services even though they are not U.S. citizens.

I declare under penalty of law that the foregoing is true and correct to the best of my knowledge.

DATED: Honolulu, Hawaii, September 29, 2017.


JUDY MOHR PETERSON, PhD